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February 11, 2022

**BY ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007

Re: *Nichole Adams-Flores v. City of New York, et al.*  
Docket No. 18-CV-12150 (JMF)

Dear Judge Furman:

I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for the defendants City of New York, Cynthia Brann, Jeff Thamkittikasem, and Martin Murphy<sup>1</sup> (collectively “defendants”), in the above-referenced action.

I write to respectfully request an extension of the time for defendants to file a summary judgment motion from February 18, 2022, to April 4, 2022. This is defendants’ first request to extend the summary judgment deadline. Plaintiff consents to this request and has requested a concurrent extension of the remainder of the summary judgment schedule. Accordingly, defendants respectfully request that plaintiff’s time to oppose defendants’ motion be extended from March 25, 2022 to May 9, 2022, and defendants’ time to reply from April 8, 2022, to May 23, 2022.

This extension of time is necessary because on February 11, 2022, Magistrate Judge Parker granted plaintiff’s request for discovery in limited part. The additional discovery includes defendants producing a 30(b)(6) witness by March 4, 2022. This additional time will

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<sup>1</sup> The other named defendants, Health & Hospitals Corporation (“HHC”), Patsy Yang (Yang”) and Ross MacDonald (“MacDonald”) have been dismissed from this case.

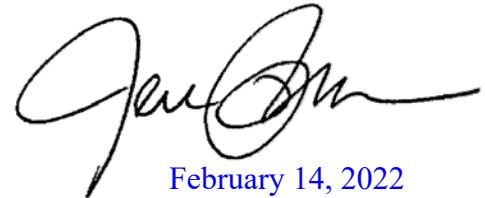
permit defendants to complete this additional discovery and then an additional month for defendants to obtain the transcript from the deposition and submit a summary judgment motion based on the full record of discovery to the Court.

Respectfully Submitted,  
/s/  
Aliza J. Balog  
Assistant Corporation Counsel

Cc: Counsel of Record  
(By ECF)

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 151.

SO ORDERED.



February 14, 2022